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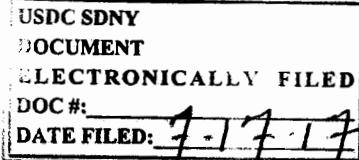
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# MEMO ENDORSED

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June 19, 2017

VIA ECF



The Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Chevron Corp. v. Donziger*, No. 11-cv-691 (LAK)

Dear Judge Kaplan:

I respectfully write as counsel for Plaintiff Chevron Corporation (“Chevron”) to apprise the Court of today’s denial of Defendants’ petition for certiorari by the Supreme Court of the United States. See Order List (June 19, 2017), [https://www.supremecourt.gov/orders/courtorders/061917zor\\_6537.pdf](https://www.supremecourt.gov/orders/courtorders/061917zor_6537.pdf).

In view of the Supreme Court’s order, Chevron respectfully requests that the Court reactivate Chevron’s motion for attorneys’ fees and bill of costs, which the Court previously deferred until “the determination of the petition [for certiorari] and any ensuing consideration by the Supreme Court.” Dkt. 1916; Dkt. 1921.

Furthermore, Chevron requests that the Court require Steven Donziger to comply with this Court’s March 4, 2014 Judgment, which required him to “execute in favor of Chevron a stock power transferring to Chevron all of his right, title and interest in his shares of Amazonia,” the entity he created to try to shield any judgment proceeds from both U.S. and Ecuadorian authorities. Dkt. 1875 ¶ 3. The Court amended this order to require Donziger to transfer his Amazonia shares to the Clerk of the Court “pending the determination of the appeal in this case.” Dkt. 1901 at 32. Donziger appears never to have complied with the Court’s order. There is no justification for Donziger’s continued violations, and Chevron respectfully requests that the Court order Donziger to comply forthwith, or else face sanctions.

Respectfully,

Randy M. Mastro

Memorandum Endorsement

Chevron Corp. v. Donziger, 11-cv-0691 (LAK)

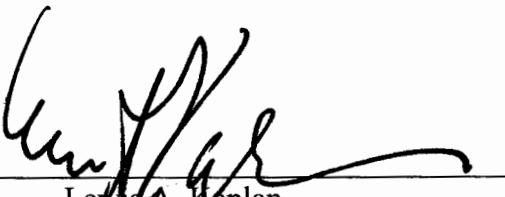
1. Plaintiff's motion for attorneys' fees is hereby reactivated. The Court notes that Donziger long ago applied for an extension of time within which to "contest the reasonableness of the rates and hours requested." DI 1895, at 5. Bearing in mind that Donziger already has had over three years since the trial court's decision on the merits and just about a full year since the Second Circuit affirmed this Court's judgment, the application for an extension of time is granted to the extent that any papers with respect to those subjects shall be filed on or before August 7, 2017. Unless otherwise ordered, any responsive papers on those subjects shall be filed no later than August 28, 2017 and any reply papers on those subjects shall be filed no later than September 11, 2017. As the motion for attorneys' fees was fully submitted in all other respects, there shall be no papers filed that address subjects other than the reasonableness of the rates and hours requested absent leave of the Court.

2. The Clerk shall proceed to tax costs.

3. Plaintiff requests that the Court require Steven Donziger to comply with the March 4, 2014 judgment. It complains also that Donziger did not comply with that judgment as temporarily modified by order dated April 25, 2014. Whether construed as a request for a further order or for other relief, this aspect of the application may not be made by letter motion. To that extent, it is denied without prejudice to proceeding by formal motion.

SO ORDERED.

Dated: July 17, 2017

  
Lewis A. Kaplan  
United States District Judge